

8403 Lindenwood Road • Rockford, IL 61109 • Tel (815) 874-4806 • Fax (815) 874-4630

April 29, 2004

Illinois Environmental Protection Agency Bureau of Air Compliance Section (MC 40) P.O. Box 19276 Springfield, Illinois 62794-9276

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RE: Annual Compliance Certification - 2003

Pagel Landfill

Title V – CAAPP Permit Number 99020102

Facility ID Number: 201801AAF

AIR ENFORCEMENT BRANCH, U.S. EPA, REGION 5

Winnebago Reclamation Service respectfully submits the attached Annual Compliance Certification Report (Form 401-CAAPP), as required by Standard Permit Condition 9.8 of the above referenced permit.

This Compliance Certification Report applies to the time period January 1, 2003 through December 31, 2003. If you have any questions, please contact me at (815) 381-5649.

Sincerely,

WINNEBAGO RECLAMATION SERVICE.

Evan Buskohl

Environmental Manager

Attachment: Form 401-CAAPP

cc: Bridgette Chapman, EMCON/OWT, Inc.

USEPA Region 5

Illinois EPA Peoria Regional Field Office



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL COMPLIANCE AND SYSTEMS MANAGEMENT SECTION 1021 NORTH GRAND AVENUE EAST, P O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276

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	(JS)	NUMBER	DR'AGENCYJUSE ONLY
CAAPP ANNUAL COMPLIANCE CERTIFIC	ATION PE	ERMIT#	
	DA	ATE	
THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) RE EMISSION UNITS AT THE SOURCE AS REQUIRED BY CONDITION 98 THE COMPLIANCE CERTIFICATION F PRECEDING CALENDAR YEAR THIS CERTIFICATION	′ 40 CFR 70 6 (c) (5), 39 5 (7) REPORTING PERIOD IS JAN) (p) (v) OF THE ENVIRONME NUARY 1 TO DECEMBER 31 .	AND IS DUE ON OR BEFORE MAY 1 FOR THE
	SOURCE IN	IFORMATION	
1) SOURCE NAME: Pagel Landfill			
2) SOURCE ADDRESS: 8403 Lindenwood	Road		
3) CITY: Rockford		4) COUNTY.	
5) TOWNSHIP:	6) STATE. Illinois		7) ZIP CODE 61109
8) DATE FORM PREPARED. April 16, 2004		9) SOURCE ID NO 2	201801AAF
10) CAAPP PERMIT NO : 99020102		-	
10) CALENDAR YEAR OR REPORTING PERIOD		EPORT	
January 1, 2003 through December 31, 20	103		
	COURCE COMPUIA	VAC INCODIATION	
12) CHECK EITHER (a) OR (b) BELOW:	SOURCE CONFLIA	NCE INFORMATION	
(a) During the entire reporting period contained in its CAAPP permit. The me specified in the permit.	od, this source was in thod used to determ	n continuous compli line compliance for e	nance with ALL terms and conditions ach term and condition is the method
NOTE: If (a) is selected, completion o	f Table 1 is optiona	al. Table 2 does not	: need to be completed.
(b) With the exception of the items is with all terms and conditions contained is condition is the method specified in the parameters. NOTE: If (b) is selected, complete Tailon compliance status.	in the permit. The mipermit, unless otherw	nethod used to determ wise indicated	nine compliance for each term and
			i

ATTACH	IMENTS
13) Are you submitting any attachments with this report?	⊠ Yes □ No
If yes, please list the attachments below:	
Semi - Annual Compliance Monitoring Report - Quarte	er 1 and Quarter 2, 2003
Semi – Annual Compliance Monitoring Report – Quarte	er 3 and Quarter 4, 2003
	ATION REPORT MAILING
14) In addition to submitting the Compliance Certification rep (CASM), a copy of the Compliance Certification report m appropriate IEPA regional field office. Addresses are list	oort to the Compliance and Systems Management Section ust also be submitted to the USEPA Region 5 and the
Please check the appropriate boxes.	
A copy of the Compliance Certification report has been subr	mitted to USEPA
	Yes 🗌 No
A copy of the Compliance Certification report has been sub	mitted to the appropriate IEPA regional field office
	Yes No
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	TACT PERSON
SOURCE CON 15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT E	
15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT E 16) TECHNICAL CONTACT PERSON TITLE. Environmental Manager	van Buskohl 17) CONTACT PERSON'S TELEPHONE NUMBER 815-381-5649
15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT E 16) TECHNICAL CONTACT PERSON TITLE. Environmental Manager COMPLIANCE STATEMEN	van Buskohl 17) CONTACT PERSON'S TELEPHONE NUMBER 815-381-5649 T AND SIGNATURE BLOCK
15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT E 16) TECHNICAL CONTACT PERSON TITLE. Environmental Manager COMPLIANCE STATEMEN NOTE A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATINCOMPLETE	TAND SIGNATURE BLOCK TION UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS
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lable 1.	_ [us for Applicable	Listing of Compliance Status for Applicable Permit Terms and Conditions
Pagel Landfill			201801AAF
Ferming the Condition of Reference	Describuon of Parmitt Condition	Compliance Status:	Compliance Determination (Wethod
Wimber		intermittent Noncompliance - N	
1.0	SOURCE IDENTIFICATION	C	Not Applicable – Section Title
1.1 1.2 1.3 1.4	Source Owner/Parent Company Operator General Source Description		Not Applicable – Administrative Information
2.0	LIST OF ABREVIATIONS/ ACRONYMS USED IN THIS PERMIT	C	Not Applicable - Descriptive Information
3.0	INSIGNIFICANT ACTIVITIES	v	Not Applicable - Section Title
3.1 3.2 3.3	Identification of Insignificant Activities Compliance with Applicable Requirements Addition of Insignificant Activities	Ų	Not Applicable – Descriptive Information
4.0	SIGNIFICANT EMISSIONS UNITS AT THIS SOURCE	C	Not Applicable – Descriptive Information
5.0	OVERALL SOURCE CONDITIONS	υ	Not Applicable – Section Title
5.1	Source Description	υ	Not Applicable - Descriptive Information
5.2	Applicable Regulations	C	Not Applicable – Section Title
521	Specific Emission Units Subject to Particular Regulations Mentioned in Section 7	C	Not Applicable - Instructions
5 2.2	Fugitive PM Emission and Opacity	C	Monitor and control dust on a weekly basis. Records kept
5.2.3	Ozone Depleting Substances	v	Ozone depleting substances not accepted for disposal during the reporting period Ozone depleting substances are handled by trained staff from a separate company
524	Risk Management Plan	C	Not Applicable During Reporting Period

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Source Danumber Annumber Source Sourc	ZOTOS INTERNATIONAL DESCRIPTION OF THE PROPERTY OF THE PROPERT	(4) Method	This permit condition did not require additional action from the facility	during the reporting Period Not Applicable During Reporting Period	Not Applicable	Monitor and control dust on a weekly basis Records kept	Emissions calculated for significant units. Emissions limit were not exceeded. Design capacity did not change	Records Filed	Not Applicable – Section Title	Deviations were reported. However, some deviation reports were not submitted within 30 days of an exceedance or deviation	An Annual Emissions Report for calendar year 2002 was submitted April 29, 2003.	Not Applicable – None	Emissions calculation procedures followed	Not Applicable	Not Applicable - Section Title	Not Applicable - Descriptive Information
		omplance ontimotis	Noncompliance	C	0	၁	O	C	C		C	O .	C	0	Ú	
SourceName A state of the s		Description of the Reserve of the Re	Future Applicable Requirements	Episode Action Plan	Non-Applicability of Regulations of Concern	Source-wide Operational and Production Limits and Work Practices	Source-wide Emission Limitations	General Recordkeeping Requirements	General Reporting Requirements	General Source-Wide Reporting Requirements - Deviations	Annual Emissions Report	General Operational Flexibility/Anticipated Operating Scenarios.	General Compliance Procedures	EMISSIONS REDUCTION MARKET SYSTEM (ERMS)	UNIT SPECIFIC CONDITIONS	MSW Landfill -Unlity (Open) Flare with Backup Enclosed Flare.
Source(Name	Pagel Landfill	Permit Condition Respective	5.2.5	5.2.6	5.3	5.4	5.5	5.6	5.7	5.71	57.2	5.8	59	6.0	7.0	7.1

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Terms and Conditions	
Permit	
Applicable	
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Table 1. Listi	
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Source Name Pagel Landfill	Source Name Commercial		201801AAF
Permit Permit Condition Reference	Description of Parties Remit Condition	Compilance Status	
		Intermittent (* 1811) Noncompliance (* 1772)	
7.1 1	Description of Municipal Solid Waste		
7 1.2	List of Emission Units and Air Pollution Control Equipment	Ų	Not Applicable – Descriptive Information
7.1.3 a through 7.1 3 c	Applicability Provisions and Applicable Regulations	D.	GCCS Design Plan approved via permit number 99040045, issued July 6, 1999 GCCS installed Control device equipped with fail safe valve.
7.13d	Applicability Provisions and Applicable	I	On some occasions, negative pressure was not maintained at the individual wellheads
	Regulations - GCCS		On some occasions, the oxygen concentration at individual wellheads was above 5% Temperature at the individual wellheads was never above 131 degrees F
			Methane concentrations were below 500 ppm above background during quarterly
			surface emissions monitoring. Collected LFG was directed to a control device. LFG was never vented to the atmosphere. Records are kept of monitoring activities.
7.1.3 e	Applicability Provisions and Applicable Regulations - Asbestos	C	The facility is active and accepted asbestos material during the reporting period. Waste records are kept. Proper cover is placed. Signage is posted.
7 1.3 f	Applicability Provisions and Applicable Regulations - Open Flare	၁	Flare is designed and operated in accordance with 40 CFR 60 18 Stack test results reported and kept on file.
7.1.4	Non-Applicability of Regulations of Concern	U	Not Applicable - Descriptive Information
7.1.5	Operational and Production Work Practices	U	Site follows requirements for proper coverage of material and proper recordkeeping
7.1.6	Emissions Limitations	O	Emissions calculated and records kept on file. 2003 emissions from flares were below limits
7.1.7	Testing Requirements	U	LANDGEM model used to calculate NMOC annual emissions NMOC emission rate exceeds 50 MG/yr GCCS is installed. Stack test performed on open flare in March 2003 Test report was submitted in April 2003.

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Table 1. L	

Source Name:	Vames and the second of the se		Sourcell D Number 201801AAF
	Description of Permit Condition	Complance Status	Compliance Determination Method
		Noncompliance FIN S	
7.18	Monitoring Requirements	3	Not Applicable- Section Title
7.18a	General Requirements	ပ	Flow rate measuring device installed and operational for the reporting period. Records kept on file.
71.8 b	General Requirements		Surface methane emissions monitored quarterly. Records are kept.
			Monthly cover integrity inspections performed. Records are kept Heat-sensing device and flow meter installed at open flare. Chart recorder installed
			Downtume logs are maintained. Enclosed flare did not operating during the reporting period.
7.1.9 a	Recordkeeping Requirements – General Records	ပ	Site specific NMOC emission rate records are kept on file. Records of monthly emissions from the control system are kept on file.
	n n n n n		Nection Canacity Report is kent on file. Current amount of solid waste in-place
7 1.9 6	NSPS Records	-	and year-by-year records are kept on file GCCS Design Plan approved via permit number 99040045. Requirements to keep records of enclosed combustion devices
			are not applicable as the site and not main or operate start of the most records of reporting period. Stack test results for open flare are on file. Most records of flame records are on file. An as-built drawing of the GCCS is on file. Wellfield surface emissions monitoring records are kept on file.
7.1.9 c	Recordkeeping Requirements – NESHAP Records		Waste shipment records are kept on file. Records of the location, depth, and area, and quantity of ACWM is maintained on a map of the disposal area.
7.1.10 a	Reporting Requirements – Deviations		Deviations were reported. In some cases, deviations were not reported within 30 days.
7.1.10 b	Reporting Requirements NSPS	Ü	NMOC and GCCS Design Plan Reports submitted historically (prior to CAAPP permit issuance). Copes of these reports are maintained on file. The site is active – a closure report was not applicable during the reporting period.
7.1 10 c	Reporting Requirements – Exceedance of Emission Limits	C	No exceedances of the emission limits in 7 1.3, 7.1 5, or 7.1 6 occurred during the reporting period.

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Source Name			201801AAF	
Permit And Conditions Reference Number Personal	Description of the Coming State of Coming State of Control of the Control of	Compliance Status I Continuous Continuous I Intermittenti XIIII	(4)) Compliance:Defermination.Metrod	
7.1.11	Operational Flexibility/anticipated Operating Scenanos	9	Not Applicable – None	
7 1.12	Compliance Procedure	O	Not Applicable – Section Title	Γ
7.1.12a	Estimating controlled methane, NMOC, and Specified Emissions	0	Instructions. Procedures followed.	T
7.1.126	Utility (Open) Flare Emissions Calculations	O	Instructions. Procedures followed.	1
7.1.12c	Enclosed Flare Emission Calculations	U	Not Applicable - Enclosed flare did not operate during the reporting period	
7.1.12d	Compliance with 40 CFR 60 Subpart WWW-Standards of Performance for MSW Landfills		GCCS Design Plan approved via permit number 99040045 Monthly wellhead monitoring performed, quarterly surface emissions monitoring performed, monthly cover integrity monitoring conducted. Records are kept on file. See attached deviation reports for details.	T
7 1.12e	Compliance with Condition 7.1.3(e)(i)	O		T
7 1.12f	Calculating Uncontrolled NMOC and VOC Emissions	J.	Instructions. Emission calculation procedures followed.	
7.2 – 7.2.2	Gasolme Tank	C	Not Applicable – Descriptive Information	T
7.2.3	Applicability Provisions and Applicable Regulations	C	A permanent submerged fill loading device is in place and used Emissions determined using TANKS 4.0	
7 2.4	Non-Applicability of Regulations of Concern	O	Not Applicable	
7.2.5	Operational and Production Limits and Work Practices	J .	A permanent submerged fill loading device is in place and used.	,

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Sourceivanne Status To Sourceivanne Status To Sourceivanne Status To Pagel Landfill Pagel Landfill Pagel Landfill Permit Condition Condition Reference Number 7.2.6 - 7.2.8 Emission Limitations, Testing Requirements 7.2.10 Reporting Requirements 7.2.11 Operational Flexiblity/Anticipated Operational Flexiblity/Anticipated Operational Flexiblity/Anticipated Operational Flexiblity/Anticipated Operational Flexibility/Anticipated Operating Scenarios 8.0 General Permit Conditions 8.1 Permit Shield 8.2 Applicability of Title IV Requirements 8.3 Emission Trading Program 8.4 Operational Flexibility/Anticipated Operating Scenarios 8.5 Testing Procedure 8.6 Reporting Requirements 8.6 Reporting Reports

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Manager and Source II D. Number 2014 12 12 12 12 12 12 12 12 12 12 12 12 12	201801AAF	Compliance Determination Method	Notification of stack testing took place at least 60 days before testing occurred								ecc (c		No Emergency occurred during the reporting period	Descriptive Information No shutdown occurred during the reporting period.	Not applicable during the reporting period.	Not Applicable - Descriptive Information
		Compilance Status Continuous Continuous Infermittent Noncompilance	C					({				C	C	Ü	၁
SourceNames Little And Control of the		Description of Permit Condition	Test Notifications	Ę	•				e c				Defense to Enforcement Actions	Permanent Shutdown	Reopening and Reissuing Perruit for Clause	Severability Clause
Source Name	Pagel Landfill	Personal Condition Conditi	8.6.2	8.6.3	8.64	8.7	9.0	9.1 – 9.5	9'6	7.6	8.6	66	9.10	9.11	9.12	9.13

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Source Namers Pagel Landfill			201801AAF
Permit (4) Condition Reference	Description of Family F	Compliance Status Continuous S.C. Intermittents (FT)	Compliance Determination Method
9.14	Permit Expiration and Renewal	C	Descriptive Information Not applicable during the reporting penod.
10.0	Attachments	Э	Not Applicable Section Title
10 1 10 2 10 3 10.4	Attachment 1 Attachment 2 Attachment 3 Attachment 4	2	Descriptive Information and/or Fuure Applicable Requircments
10.5	Attachment 5		

Table 2. Deviation Summary Report	/ Report
2. Deviation	Summan
able 2.	
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Table 2. Source Nam	l able 2. Deviation Summary Report Source Name Source	mmary h	leport		Sourcell DiNumber	Number 2
Pagel Landfill	=				Z010011XX	
经验证	47		张智慧 (4)	La Description and Causero	Corrective Action(s)	William Community (Villamento)
Condition	Permit Condition	Reniod 19	Period	A Deviation Manager and Mana		Prevent Future Deviations
Reference		Start Dates	Brd Date			
大型配件を開催を表する 5.7.1	Reporting Requirements	I-1-2003	12-31-2003	Deviation reports were not	Reporting deviation as soon as	Staff have been trained on requirements
7 1.10 (a)				submitted within 30 days.	possible	for reporting.
7.1.9 (b)(ii)(c)	Maintain records of	1-8-2003	1-20-2033	See attached semi-annual	See attached semi-annual	See attached semi-annual
	operational parameters,	3-29-2003	3-31-2003	reports and deviation reports	reports and deviation reports	reports and deviation reports
	including flow rate.	10-2-2003	10-8-2003			
7 1.12 (d)(m)	Compliance with 40			See attached semi-annual	See attached semi-annual	See attached sellinal
7.1.12 (d)(v)	CFR 60 Subpart		,	reports and deviation reports	reports and deviation reports	מיים ביים ביים מיים ביים ביים ביים ביים
	WWW-Standards	1-1-2003	6-30-2003			
	Performance for					
	MSW Landfills		00000	Ti.	Onerstand data for flare was	Staff have been instructed to check the
7.1.9 (b)(u)(c)	7.1.9 (b)(11)(c) Maintain records of	7-1-2003	1-9-2003	use exceeded No available	downloaded to a permanent	storage space of the database more
	operational parameters,			space to store flare operating	storage file. Afterwards, databass	frequently
	in the state of th			data.	was able to record data	
	1 1	_		1		



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August 29, 2003

Illinois Environmental Protection Agency (IEPA) Bureau of Air Compliance Section (MC 40) P.O. Box 19276 Springfield, IL 62794 - 9276

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RE:

Semi-Annual Compliance Monitoring Report – Quarter 1 and Quarter 2, 2003 CUSTAL OF AIR
STATE OF ILLINOIS Title V - CAAPP Permit No. 99020102

Winnebago Reclamation Service - I.D. No. 201801AAF

Winnebago Reclamation Service respectfully submits this semi-annual compliance monitoring report, as required by Permit Condition 8.6.1 of the above referenced Title V - CAAPP Permit. This semi-annual compliance monitoring report applies to the time period January 1, 2003 through June 30, 2003. A summary of the monitoring results and identification of any deviations from the applicable monitoring requirements are discussed below.

CONTROL DEVICE OPERATIONS

Pagel Landfill owns and operates one utility (open) flare with backup enclosed flare per Title V (CAAPP) Permit Number 99020102.

Per Permit Conditions 7.1.8.(a)(i)(A) and 7.1.8(a)(i)(B), landfill gas flow to the control system was continuously monitored and recorded every fifteen minutes during periods of operation. The landfill operates one open flare as the primary control device and the flow rate was continuously monitored and recorded for periods of operation during the reporting period, except as detailed in the attached 405-CAAPP form.

The enclosed flare at the facility is used as a backup device and did not operate during the reporting period. Therefore, there was no landfill gas flow and combustion temperature to be monitored or recorded per Permit Condition 7.1.8(a)(iv)(B).

SURFACE EMISSIONS MONITORING

Per Title V (CAAPP) Permit Condition 7.1.8(b)(i)(A), surface concentrations of methane were monitored along the perimeter of the collection area on a quarterly basis. The data for the monitoring events are recorded and kept on file. No exceedances were recorded for the first and second quarter monitoring events which took place on March 13, 2003 and June 14, 2003.

COVER INTEGRITY

Per Title V (CAAPP) Permit Condition 7.1.8(b)(i)(E), monthly cover integrity inspections are conducted and recorded. Cover repairs are implemented as necessary and records are kept on Illinois EPA
Bureau of Air
Compliance Section (MC 40)
September 2, 2003
Page 2

WELLFIELD MONITORING

Per Title V (CAAPP) Permit Condition 7.1.8(b)(iv)(A)(1-3), monthly monitoring at each wellhead is being conducted. The monthly monitoring includes monitoring for vacuum (pressure), oxygen, and temperature. Data from the monitoring is recorded and any corrective actions if necessary are initiated within five day and re-monitoring occurs within fifteen days. Monthly wellfield monitoring and corrective actions are recorded and kept on file. For the reporting period, there were no exceedances of the wellfield monitoring parameters except as detailed in the attached 405-CAAPP form.

SOURCE WIDE OPERATIONAL AND PRODUCTION LIMITS AND WORK PRACTICES

Per Title V (CAAPP) Permit Condition 5.4(a) fugitive dust inspections, results, and corrective actions taken on roadways, reentrainment during landfilling activities and landfill surfaces were monitored during the reporting period. The data from these monitoring events is recorded and kept on file.

CERTIFICATION

This correspondence also contains the Certification Form required by Permit Condition 9.9 of the truth, accuracy, and completeness of the semi-annual compliance monitoring report.

If you have any questions, please contact Mr. Evan Buskohl at (815) 874-4806.

Sincerely,

Winnebago Reclamation Service

Thomas Hilbert, P.E. Vice President

Attachment:

Form 400-CAAPP

Form 405-CAAPP

CC:

IEPA, Air Regional Field Office - Peoria, IL

Evan Buskohl, Pagel Landfill

Bridgette Chapman, EMCON/OWT, Inc.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION P O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE						
Revision #						
Date.	_ / _		/			
Page		of _				
Source Designation						

	a District Note Caucht Share
COMPLIANCE AND GENERAL	ID NUMBER
REPORTING FORM	PERMIT #.
	DATE

THIS FORM IS USED FOR EITHER OF THE FOLLOWING:

- TO REPORT AND CERTIFY COMPLIANCE OF AN ENTIRE SOURCE OR SPECIFIC ITEMS OF EQUIPMENT WITH ALL APPLICABLE REQUIREMENTS DURING A REPORTING PERIOD, OR
- TO IDENTIFY AND ENSURE PROPER PROCESSING OF A SUBMITTED REPORT. THIS FORM SHOULD BE USED AS THE COVER SHEET OF THE SUBMITTED REPORT.

SOURCE	E INFORMATION						
1) SOURCE NAME. Pagel Landfill							
2) DATE FORM PREPARED August 13, 2003	3) SOURCE ID NO (IF KNOWN) 201801AAF						
GENERA	L INFORMATION						
4) INDICATE FOR WHICH OF THE FOLLOWING THIS FO							
TO REPORT AND CERTIFY COMPLIANCE OF THE SOURCE OR SPECIFIC ITEMS OF EQUIPMENT WITH ALL APPLICABLE REQUIREMENTS TO IDENTIFY AND ENSURE PROPER PROCESSING OF A SUBMITTED REPORT 5) PERIOD COVERED BY THIS PERORT:							
5) PERIOD COVERED BY THIS REPORT:							
FROM <u>01/01/2003</u>	TO: <u>06</u> / <u>30</u> / <u>2003</u>						
6) NAME AND PHONE NUMBER OF PERSON TO CONTAC	CT FOR QUESTIONS REGARDING THIS REPORT.						
NAME: Evan Buskoht TiTLE Environmental Manager							
PHONE#: (815) 381-5649 EXT							

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR 1039 5 DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER

APPLICATION PAGE 1

FOR APPLICANT'S USE

COMPLIANCE OF SOURCE OR EQUIPMENT DURING REPORTING PERIOD
COMPLETE ITEM 7 BELOW IF THIS FORM IS BEING USED TO REPORT AND CERTIFY COMPLIANCE OF THE ENTIRE SOURCE.
COMPLETE ITEM 8 BELOW IF THIS FORM IS BEING USED TO REPORT AND CERTIFY COMPLIANCE OF SPECIFIC ITEMS OF EQUIPMENT ONLY
7) WAS THE SOURCE IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS FOR THE Yes No ENTIRE REPORTING PERIOD?
IF YES, THEN THE "REPORT INFORMATION" SECTION ON PAGE 3 OF THIS FORM DOES NOT NEED TO BE COMPLETED.
IF NO, THEN COMPLETE AND SUBMIT FORM CAAPP-405 - "EXCESS EMISSIONS, MONITORING EQUIPMENT DOWNTIME, AND MISCELLANEOUS REPORTING FORM "
8a) LIST THE EMISSION UNIT(S) AND CONTROL EQUIPMENT FOR WHICH THIS FORM IS BEING COMPLETED TO REPORT AND CERTIFY COMPLIANCE WITH (IF ADDITIONAL SPACE IS NEEDED FOR ITEM 10, ATTACH AND LABEL AS EXHIBIT 400-A)
b) IDENTIFY THE APPLICABLE REQIREMENT(S) FOR WHICH THIS FORM IS BEING USED TO REPORT AND CERTIFY COMPLIANCE WITH:
c) IDENTIFY THE APPLICABLE REQIREMENT(S) WHICH REQUIRE THAT THIS REPORT OR CERTIFICATION BE SUBMITTED:
d) WERE THE ABOVE REFERENCED ITEMS IN 8(a) IN COMPLIANCE WITH ALL YES NO APPLICABLE REQUIREMENTS FOR THE ENTIRE REPORTING PERIOD?
IF YES, THEN THE "REPORT INFORMATION" SECTION ON PAGE 3 OF THIS FORM DOES NOT NEED TO BE COMPLETED.
IF NO, THEN COMPLETE AND SUBMIT FORM CAAPP-405 - "EXCESS EMISSIONS, MONITORING EQUIPMENT DOWNTIME, AND MISCELLANEOUS REPORTING FORM"

REPORT INFORMATION
9) TITLE OF REPORT BEING SUBMITTED:
Semi-Annual Compliance Monitoring Report
10) IDENTIFY THE APPLICABLE REQIREMENT(S) WHICH REQUIRES THIS REPORT (IF APPLICABLE):
Permit Condition 8.6.1 of CAAPP Permit No. 99020102.
11) BRIEFLY EXPLAIN WHAT THIS REPORT COVERS.
This semi-annual compliance monitoring report is a summary of the monitoring results and identification of deviations from the applicable monitoring requirements as specified in the permit.
12) ATTACH THE REPORT TO THIS FORM
SIGNATURE BLOCK
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE RETURNED AS INCOMPLETE
13) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE.
AUTHORIZED SIGNATURE:
AUTHORIZED SIGNATURE Vice President TITLE OF SIGNATORY
Thomas Hilbert TYPED OR PRINTED NAME OF SIGNATORY DATE



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION P O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

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PERMIT #.
DATE

THIS FORM IS TO BE USED TO REPORT THE FOLLOWING:

- EXCESS EMISSIONS. I.E, THE AMOUNT OF EMISSIONS EXCEEDS THAT OF AN EMISSION STANDARD, PERMIT LIMIT OR OTHER APPLICABLE REQUIREMENT
- DOWNTIME OF EMISSIONS MONITORING OR OTHER COMPLIANCE MONITORING EQUIPMENT IS NOT SPECIFIED IN THE PERMIT

COMPAC DIFOCALATION

MISCELLANEOUS INCIDENTS OF POSSIBLE NONCOMPLIANCE TO AN APPLICABLE REQUIREMENT

SOURCE IN	PORMATION	
1) SOURCE NAME. Pagel Landfill		
2) DATE FORM PREPARED: August 29, 2003	3) SOURCE ID NO. (IF KNOWN): 201801AAF	
GENERAL IN	IFORMATION	
4) INDICATE WHICH OF THE FOLLOWING THIS FORM IS BE	ING USED TO REPORT:	
EXCESS EMISSIONS	ъ.	
DOWNTIME OF EMISSIONS MONITORING OR OTHER COMPLIANCE MONITORING EQUIPMENT NOT SPECIFIED IN THE PERMIT		
MISCELLANEOUS INCIDENT OF POSSIBLE NON	COMPLIANCE	
5) PERIOD COVERED BY THIS REPORT.		
FROM January 1, 2003 TO	June 30, 2003	
6) NAME AND PHONE NUMBER OF PERSON TO CONTACT F	OR QUESTIONS REGARDING THIS REPORT	
NAME <u>Eyan Buskohl</u> TITLE: <u>Environmental Mana</u>	ger "	
PHONE#: (<u>815)</u> 381-5649 EXT.		

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR, 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE

FOR APPLICANT'S USE

Printed on Recycled Paper 405-CAAPP

EXCESS EMISSIONS
7) IDENTIFY THE EMISSION UNIT(S) AND ASSOCIATED CONTROL EQUIPMENT WHICH EXCEEDED AN EMISSION STANDARD, PERMIT CONDITION LIMIT, OR OTHER APPLICABLE REQUIREMENT (IF ADDITIONAL SPACE IS NEEDED FOR THIS SECTION, ATTACH AND LABEL AS EXHIBIT 405-1)
8) IDENTIFY THE EMISSION STANDARD(S) OR LIMIT(S) THAT WAS EXCEEDED
9a) PROVIDE THE TYPE(S) AND AMOUNT(S) OF EMISSIONS THAT OCCURRED DURING THE EXCEEDANCE IN UNITS IDENTICAL TO THAT OF EACH EMISSION STANDARD OR LIMIT THAT WAS EXCEEDED.
b) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EMISSIONS WERE BASED AND LABEL AS EXHIBIT 405-1
10) DURATION OF EXCEEDANCE (E.G., 1 HOUR & 50 MINUTES)
11) DATE OF OCCURRENCE OF EXCEEDANCE.
12) DESCRIBE THE EXCEEDANCE INCIDENT, INCLUDING THE SUSPECTED OR KNOWN CAUSE OF THE EXCEEDANCE.
13) DESCRIBE CORRECTIVE ACTIONS TAKEN AT THE TIME OF THE EXCEEDANCE INCIDENT
14) DESCRIBE SUBSEQUENT ACTIONS TAKEN TO PREVENT FUTURE EXCEEDANCES
UNDERSTEEN DOWNERS OF THE STATE
UNPERMITTED DOWNTIME OF MONITORING EQUIPMENT
15) IDENTIFY THE MONITORING EQUIPMENT WHICH WAS NONFUNCTIONAL, INCLUDING THE MONITORED PARAMETER AND THE EMISSION UNIT(S) AND/OR CONTROL EQUIPMENT BEING MONITORED.
16) DATE MONITOR WAS DOWN:
17) DURATION OF MONITOR DOWNTIME (E.G., 1 HOUR & 50 MINUTES).
18) DESCRIBE THE SUSPECTED OR KNOWN CAUSE OF THE MONITOR FAILURE
19) DESCRIBE CORRECTIVE ACTIONS TAKEN AT THE TIME OF MONITOR FAILURE
20) DESCRIBE SUBSEQUENT ACTIONS TAKEN TO PREVENT FUTURE FAILURES.

MISCELLANEOUS INCIDENT

21) DESCRIBE THE INCIDENT AND IDENTIFY THE EMISSION UNIT(S) AND CONTROL EQUIPMENT INVOLVED

The open flare was operating as the LFG flow rate to the flare was being monitored continuously; however, records of the LFG flow rate to the flare are not available during the time periods listed below.

Several gas extraction wells were found to be operating with a positive pressure during the time periods listed below. Corrective actions were performed and the wells were operating at a negative pressure within 16 days; however, records of re-monitoring were not kept on file. Additionally, several gas extraction wells were found to have oxygen concentrations above 5% that were not corrected within 15 days during the time periods listed below.

22) PROVIDE THE RULE(S) OR PERMIT CONDITION(S) WHICH MAY HAVE BEEN VIOLATED (IF APPLICABLE)*

CAAPP Permit Condition 7.1.9 (b)(ii)(C) CAAPP Permit Condition 7.1.10 (d)(iii CAAPP Permit Condition 7.1.10 (d)(v)

23) DATE OF OCCURRENCE OF THE INCIDENT

CAAPP Permit Condition 7.1.9 (b)(ii)(C) – January 8, 2003 – January 20, 2003 AND March 29, 2003 – March 31, 2003 CAAPP Permit Condition 7.1.10 (d)(iii) – January 1, 2003 – June 30, 2003 (intermittently) CAAPP Permit Condition 7.1.10 (d)(v) – January 1, 2003 – June 30, 2003 (intermittently)

24) DURATION OF THE INCIDENT (E.G., 1 HOUR & 50 MINUTES).

CAAPP Permit Condition 7.1.9 (b)(ii)(C) – January 8, 2003 – January 20, 2003 – 13 days (flow rate not recorded) CAAPP Permit Condition 7.1.9 (b)(ii)(C) – March 29, 2003 – March 31, 2003 – 3 days (flow rate was not recorded) CAAPP Permit Condition 7.1.10 (d)(iii) – January 1, 2003 – June 30, 2003 (on occasions) CAAPP Permit Condition 7.1.10 (d)(v) – January 1, 2003 – June 30, 2003 (on occasions)

25a) PROVIDE THE TYPE AND AMOUNT OF EMISSIONS THAT OCCURRED DURING THE INCIDENT IN UNITS IDENTICAL TO THAT OF EACH EMISSION STANDARD OR LIMIT (IF APPLICABLE).

Not Applicable

b) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EMISSIONS WERE BASED AND LABEL AS EXHIBIT 405-3

26) DESCRIBE THE SUSPECTED OR KNOWN CAUSE OF THE INCIDENT.

Intermittent flare operating records is due to limited capacity of the recording database.

27) DESCRIBE CORRECTIVE ACTIONS TAKEN AT THE TIME OF THE INCIDENT

When it was discovered that the recording database had reached its maximum capacity, site staff downloaded the flare operating data to a separate file for permanent storage. After downloading the data, the recording database was available for storing flare operating data again.

Corrective actions were performed immediately to gas extraction wells that were found to be operating at a positive pressure during monthly monitoring events. Re-monitoring of these wells was conducted within 15 days to confirm compliance with the operating conditions. In each case, negative pressure was achieved within 15 days; however, no records were kept of the re-monitoring events. Subsequent monthly monitoring records indicated the wells had achieved negative pressure.

In most cases, no corrective actions within 6 days or re-monitoring within 15 days was performed when gas extraction wells were found to have oxygen concentration above 5%. Field staff believed that the oxygen concentration operating condition of less than 5% applied to the gas system in its entirety (oxygen concentration taken at the header before reaching the flare). Field staff were not aware that oxygen concentrations must be below 5% at each interior wellhead.

28) DESCRIBE SUBSEQUENT ACTIONS TAKEN TO PREVENT FUTURE INCIDENTS:

Site staff will check the capacity of the recording database and download data to a separate file for permanent storage on a more frequent basis to make sure there is sufficient space in the recording database to continue recording flare data.

Field staff have been retrained to keep appropriate records, including records of re-monitoring, and to perform corrective actions and re-monitoring at wells that have oxygen concentrations equal to or above 5%.

APPLICATION PAGE

29) PROVIDE ANY OTHER PERTINENT INFORMATION

The facility began to upgrades to the wellfield in June 2003. In August 2003, wellfield staff found poor seals at several sample ports, and replaced sample ports. Immediately, oxygen concentrations in these wells dropped. Work will continue until all wells have been thoroughly inspected and upgraded as necessary.

SIGNATURE BLOCK

NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE RETURNED AS INCOMPLETE

30) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE.

AUTHORIZED SIGNATURE

BY

AUTHORIZED SIGNATURE

Vice President
TITLE OF SIGNATORY

Thomas Hilbert, P.E.

TYPED OR PRINTED NAME OF SIGNATORY

DATE

APPLICATION PAGE



8403 Lindenwood Road • Rockford, IL 61109 • Tel: (815) 874-4806 • Fax: (815) 874-4630

February 25, 2004

Illinois Environmental Protection Agency (IEPA)
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, IL 62794 – 9276

RE:

Semi-Annual Compliance Monitoring Report – Quarter 3 and Quarter 4 2003 Title V – CAAPP Permit No. 99020102 Winnebago Reclamation Service - I.D. No. 201801AAF

Winnebago Reclamation Service respectfully submits this semi-annual compliance monitoring report, as required by Permit Condition 8.6.1 of the above referenced Title V — CAAPP Permit. This semi-annual compliance monitoring report applies to the time period July 1, 2003 through December 31, 2003. A summary of the monitoring results and identification of any deviations from the applicable monitoring requirements are discussed below.

CONTROL DEVICE OPERATIONS

Pagel Landfill owns and operates one utility (open) flare with backup enclosed flare per Title V (CAAPP) Permit Number 99020102.

Per Permit Conditions 7.1.8.(a)(i)(A) and 7.1.8(a)(i)(B), landfill gas flow to the control system was continuously monitored and recorded every fifteen minutes during periods of operation. The landfill operates one open flare as the primary control device and the flow rate was continuously monitored and recorded for periods of operation during the reporting period, except as detailed in the attached 405-CAAPP forms.

The enclosed flare at the facility is used as a backup device and did not operate during the reporting period. Therefore, there was no landfill gas flow and combustion temperature to be monitored or recorded per Permit Condition 7.1.8(a)(iv)(B).

SURFACE EMISSIONS MONITORING

Per Title V (CAAPP) Permit Condition 7.1.8(b)(i)(A), surface concentrations of methane were monitored along the perimeter of the collection area on a quarterly basis. The data for the monitoring events are recorded and kept on file. No exceedances were recorded for the third and fourth quarter monitoring events which took place on September 18, 2003 and December 30, 2003.

COVER INTEGRITY

Per Title V (CAAPP) Permit Condition 7.1.8(b)(i)(E), monthly cover integrity inspections are conducted and recorded. Cover repairs are implemented as necessary and records are kept on site.

Illinois EPA Bureau of Air Compliance Section (MC 40) February 25, 2004 Page 2

WELLFIELD MONITORING

Per Title V (CAAPP) Permit Condition 7.1.8(b)(iv)(A)(1-3), monthly monitoring at each wellhead is being conducted. The monthly monitoring includes monitoring for vacuum (pressure), oxygen, and temperature. Data from the monitoring is recorded and any corrective actions if necessary are initiated within five day and re-monitoring occurs within fifteen days. Monthly wellfield monitoring and corrective actions are recorded and kept on file. For the reporting period, there were no exceedances of the wellfield monitoring parameters.

SOURCE WIDE OPERATIONAL AND PRODUCTION LIMITS AND WORK PRACTICES

Per Title V (CAAPP) Permit Condition 5.4(a) fugitive dust inspections, results, and corrective actions taken on roadways, reentrainment during landfilling activities and landfill surfaces were monitored during the reporting period. The data from these monitoring events is recorded and kept on file.

CERTIFICATION

This correspondence also contains the Certification Form required by Permit Condition 9.9 of the truth, accuracy, and completeness of the semi-annual compliance monitoring report.

If you have any questions, please contact Mr. Evan Buskohl at (815) 381-5646.

Sincerely,

Winnebago Reclamation Service

Thomas Hilbert Vice President

Attachment:

Form 400-CAAPP

Form 405-CAAPP (submitted October 26, 2003) Form 405-CAAPP (submitted February 27, 2004)

cc:

IEPA, Air Regional Field Office – Peoria, IL Evan Buskohl, Pagel Landfill

Bridgette Chapman, EMCON/OWT, Inc.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION P.O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

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COMPLIANCE AND GENERAL REPORTING FORM

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THIS FORM IS USED FOR EITHER OF THE FOLLOWING:

- TO REPORT AND CERTIFY COMPLIANCE OF AN ENTIRE SOURCE OR SPECIFIC ITEMS OF EQUIPMENT WITH ALL APPLICABLE REQUIREMENTS DURING A REPORTING PERIOD, OR
- TO IDENTIFY AND ENSURE PROPER PROCESSING OF A SUBMITTED REPORT. THIS FORM SHOULD BE USED AS THE COVER SHEET OF THE SUBMITTED REPORT.

	RCE INFORMATION
1) SOURCE NAME: Pagel Landfill	
2) DATE FORM PREPARED: February 27, 2004	3) SOURCE ID NO. (IF KNOWN): 201801AAF
	RAL INFORMATION
4) INDICATE FOR WHICH OF THE FOLLOWING THIS	FORM IS BEING COMPLETED:
TO REPORT AND CERTIFY COMPLIANCE OF ALL APPLICABLE REQUIREMENTS TO IDENTIFY AND ENSURE PROPER PROCES 5) PERIOD COVERED BY THIS REPORT:	ESSING OF A SUBMITTED REPORT
4,	
FROM: 07 / 01 /2003	TO: 12 / 31 / 2003
FROM: <u>07</u> / <u>01</u> / <u>2003</u>	
	TO: 12 / 31 / 2003 ITACT FOR QUESTIONS REGARDING THIS REPORT: TITLE: Environmental Manager

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR 1039 5 DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER

APPLICATION PAGE __1__

FOR APPLICANT'S USE

COMPLIANCE OF SOURCE OR EQUIPMENT DURING REPORTING PERIOD
COMPLETE ITEM 7 BELOW IF THIS FORM IS BEING USED TO REPORT AND CERTIFY COMPLIANCE OF THE ENTIRE SOURCE.
COMPLETE ITEM 8 BELOW IF THIS FORM IS BEING USED TO REPORT AND CERTIFY COMPLIANCE OF SPECIFIC ITEMS OF EQUIPMENT ONLY
7) WAS THE SOURCE IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS FOR THE Yes No ENTIRE REPORTING PERIOD?
IF YES, THEN THE "REPORT INFORMATION" SECTION ON PAGE 3 OF THIS FORM DOES NOT NEED TO BE COMPLETED.
IF NO, THEN COMPLETE AND SUBMIT FORM CAAPP-405 - "EXCESS EMISSIONS, MONITORING EQUIPMENT DOWNTIME, AND MISCELLANEOUS REPORTING FORM."
8a) LIST THE EMISSION UNIT(S) AND CONTROL EQUIPMENT FOR WHICH THIS FORM IS BEING COMPLETED TO REPORT AND CERTIFY COMPLIANCE WITH (IF ADDITIONAL SPACE IS NEEDED FOR ITEM 10, ATTACH AND LABEL AS EXHIBIT 400-A)
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b) IDENTIFY THE APPLICABLE REQIREMENT(S) FOR WHICH THIS FORM IS BEING USED TO REPORT AND CERTIFY COMPLIANCE WITH:
c) IDENTIFY THE APPLICABLE REQIREMENT(S) WHICH REQUIRE THAT THIS REPORT OR CERTIFICATION BE
SOBMITTED:
d) WEDE THE ABOVE DESERVACED ITS 10 IV 44 IV 10
d) WERE THE ABOVE REFERENCED ITEMS IN 8(a) IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS FOR THE ENTIRE REPORTING PERIOD? NO Yes No
IF YES, THEN THE "REPORT INFORMATION" SECTION ON PAGE 3 OF THIS FORM DOES NOT NEED TO BE COMPLETED.
IF NO, THEN COMPLETE AND SUBMIT FORM CAAPP-405 - "EXCESS EMISSIONS, MONITORING EQUIPMENT DOWNTIME, AND MISCELLANEOUS REPORTING FORM."

REPORT INFORMA	TION
9) TITLE OF REPORT BEING SUBMITTED:	
Semi-Annual Compliance Monitoring Report	
10) IDENTIFY THE APPLICABLE REQIREMENT(S) WHICH REQUIRES	THIS REPORT (IF APPLICABLE):
Permit Condition 8.6.1 of CAAPP Permit No. 99020102.	
11) BRIEFLY EXPLAIN WHAT THIS REPORT COVERS:	
This semi-annual compilance monitoring report is a summary of the r from the applicable monitoring requirements as specified in the perm	monitoring results and identification of deviations nit.
2) ATTACH THE REPORT TO THIS FORM.	
SIGNATURE BLOC	
NOTE. THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL A WILL BE RETURNED AS INCOMPLETE.	
13) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMAT INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN T COMPLETE.	TION AND BELIEF FORMED AFTER REASONABLE THIS APPLICATION ARE TRUE, ACCURATE AND
AUTHORIZED SIGNATURE:	
BY 74/1/1/	Vice President
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
Thomas Hilbert TYPED OR PRINTED NAME OF SIGNATORY	February 27, 2004 DATE



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION P.O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

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- EXCESS EMISSIONS. I E., THE AMOUNT OF EMISSIONS EXCEEDS THAT OF AN EMISSION STANDARD, PERMIT LIMIT OR OTHER APPLICABLE REQUIREMENT
- DOWNTIME OF EMISSIONS MONITORING OR OTHER COMPLIANCE MONITORING EQUIPMENT IS NOT SPECIFIED IN THE PERMIT
- MISCELLANEOUS INCIDENTS OF POSSIBLE NONCOMPLIANCE TO AN APPLICABLE REQUIREMENT

	<i>IFORMATION</i>
1) SOURCE NAME: Pagel Landfill	
2) DATE FORM PREPARED: February 27, 2004	3) SOURCE ID NO. (IF KNOWN): 201801AAF
GENERAL IN	IFORMATION
4) INDICATE WHICH OF THE FOLLOWING THIS FORM IS BE	ING USED TO REPORT:
☐ EXCESS EMISSIONS	
DOWNTIME OF EMISSIONS MONITORING OR OTH SPECIFIED IN THE PERMIT MISCELLANEOUS INCIDENT OF POSSIBLE NON COUNTY OF	ER COMPLIANCE MONITORING EQUIPMENT NOT
FROM. July 1, 2003 TO: Jul	
6) NAME AND PHONE NUMBER OF PERSON TO CONTACT F	OR QUESTIONS REGARDING THIS REPORT:
NAME. Evan Buskohl TITLE. Environmental Mana	ger
PHONE#: (<u>815</u>) 381-5649 EXT:	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5 DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER

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EXCESS EMISSIONS
7) IDENTIFY THE EMISSION UNIT(S) AND ASSOCIATED CONTROL EQUIPMENT WHICH EXCEEDED AN EMISSION STANDARD, PERMIT CONDITION LIMIT, OR OTHER APPLICABLE REQUIREMENT (IF ADDITIONAL SPACE IS NEEDED FOR THIS SECTION, ATTACH AND LABEL AS EXHIBIT 405-1):
8) IDENTIFY THE EMISSION STANDARD(S) OR LIMIT(S) THAT WAS EXCEEDED:
9a) PROVIDE THE TYPE(S) AND AMOUNT(S) OF EMISSIONS THAT OCCURRED DURING THE EXCEEDANCE IN UNITS IDENTICAL TO THAT OF EACH EMISSION STANDARD OR LIMIT THAT WAS EXCEEDED:
b) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EMISSIONS WERE BASED AND LABEL AS EXHIBIT 405-1.
10) DURATION OF EXCEEDANCE (E.G., 1 HOUR & 50 MINUTES):
11) DATE OF OCCURRENCE OF EXCEEDANCE:
12) DESCRIBE THE EXCEEDANCE INCIDENT, INCLUDING THE SUSPECTED OR KNOWN CAUSE OF THE EXCEEDANCE:
13) DESCRIBE CORRECTIVE ACTIONS TAKEN AT THE TIME OF THE EXCEEDANCE INCIDENT:
14) DESCRIBE SUBSEQUENT ACTIONS TAKEN TO PREVENT FUTURE EXCEEDANCES:
UNPERMITTED DOWNTIME OF MONITORING EQUIPMENT
15) IDENTIFY THE MONITORING EQUIPMENT WHICH WAS NONFUNCTIONAL, INCLUDING THE MONITORED PARAMETER AND THE EMISSION UNIT(S) AND/OR CONTROL EQUIPMENT BEING MONITORED:
16) DATE MONITOR WAS DOWN///
17) DURATION OF MONITOR DOWNTIME (E.G., 1 HOUR & 50 MINUTES).
18) DESCRIBE THE SUSPECTED OR KNOWN CAUSE OF THE MONITOR FAILURE:
19) DESCRIBE CORRECTIVE ACTIONS TAKEN AT THE TIME OF MONITOR FAILURE:
20) DESCRIBE SUBSEQUENT ACTIONS TAKEN TO PREVENT FUTURE FAILURES.

MISCELLANEOUS INCIDENT

21) DESCRIBE THE INCIDENT AND IDENTIFY THE EMISSION UNIT(S) AND CONTROL EQUIPMENT INVOLVED:

While the open flare was operating, LFG flow rate was monitored continuously throughout the month of July 2003; however, records for LFG flow data from July 1, 2003 through July 9, 2003 are not available.

The above deviation was not reported to IEPA within 30 days of the occurrence.

22) PROVIDE THE RULE(S) OR PERMIT CONDITION(S) WHICH MAY HAVE BEEN VIOLATED (IF APPLICABLE).

CAAPP Permit Condition 7.1.9 (b)(ii)(C)

CAAPP Permit Condition 7.1.10 (a)

23) DATE OF OCCURRENCE OF THE INCIDENT:

July 1, 2003 - July 9, 2003

24) DURATION OF THE INCIDENT (E.G., 1 HOUR & 50 MINUTES):

25a) PROVIDE THE TYPE AND AMOUNT OF EMISSIONS THAT OCCURRED DURING THE INCIDENT IN UNITS IDENTICAL TO THAT OF EACH EMISSION STANDARD OR LIMIT (IF APPLICABLE):

Not applicable

b) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EMISSIONS WERE BASED AND LABEL AS EXHIBIT 405-3.

26) DESCRIBE THE SUSPECTED OR KNOWN CAUSE OF THE INCIDENT:

Intermittent flare operating records is due to limited capacity of the recording database. Failure to report the deviation within 30 days is an oversight of the facility personnel.

27) DESCRIBE CORRECTIVE ACTIONS TAKEN AT THE TIME OF THE INCIDENT:

When it was discovered that the recording database had reached its maximum capacity, site staff downloaded the flare operating data to a separate file for permanent storage. After downloading the data, the recording database was available for storing flare operating data again.

Immediately upon identifying the lack in reporting a deviation to the IEPA within 30 days, this deviation report was prepared and submitted.

28) DESCRIBE SUBSEQUENT ACTIONS TAKEN TO PREVENT FUTURE INCIDENTS:

Site staff will check the capacity of the recording database and download data to a separate file for permanent storage on a more frequent basis to make sure there is sufficient space in the recording database to continue recording flare

Site staff have been retrained on the reporting timelines identified in the CAAPP Permit.

29) PROVIDE ANY OTHER PERTINENT INFORMATION:

Site staff correctly prepared and submitted the appropriate deviation report to IEPA for the October 2003 occurrence.

SIGNATURE BLOCK

NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE RETURNED AS INCOMPLETE.

30) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE.

AUTHORIZED SIGNATURE

RY.

AUTHORIZED SIGNATURE

Vice President TITLE OF SIGNATORY

Thomas Hilbert, P.E. TYPED OR PRINTED NAME OF SIGNATORY

February 27, 2003 DATE

8403 Lindenwood Road • Rockford, IL 61109 • Tel: (815) 874-4806 • Fax: (815) 874-4630

November 26, 2003

Illinois Environmental Protection Agency Bureau of Air – Compliance Section 1021 North Grand Avenue East Springfield, Illinois 62894-9276

Re: Pagel Landfill

I.D.#201801AAF

Dear Sirs,

Please find enclosed a Notice of Deviation for the Pagel Landfill submitted on the IEPA 405-CAAPP-report form. If you have any questions please do not hesitate to call me at 815-381-5649.

Sincerely,

Evan Buskohl

Waste Group

ebuskohl@wastegroup.com

C.C. I.E.P.A, Peoria EHB



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION P.O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE		
Revision #:		
Date:	/	_ /
Page	of	
Source Designation:		

EXCESS EMISSIONS, MONITORING EQUIPMENT DOWNTIME, AND MISCELLANEOUS REPORTING FORM

// FOR/AGENC	YAVSEONEY E
ID NUMBER:	
PERMIT #:	
DATE.	

THIS FORM IS TO BE USED TO REPORT THE FOLLOWING:

- EXCESS EMISSIONS. I.E., THE AMOUNT OF EMISSIONS EXCEEDS THAT OF AN EMISSION STANDARD, PERMIT LIMIT OR OTHER APPLICABLE REQUIREMENT
- DOWNTIME OF EMISSIONS MONITORING OR OTHER COMPLIANCE MONITORING EQUIPMENT IS NOT SPECIFIED IN THE PERMIT
- MISCELLANEOUS INCIDENTS OF POSSIBLE NONCOMPLIANCE TO AN APPLICABLE REQUIREMENT

SOURCE INFORMATION			
1) SOURCE NAME: Pagel Landfill			
2) DATE FORM PREPARED: November 24, 2003	3) SOURCE ID NO. (IF KNOWN)* 201801AAF		
GENERAL INFORMATION			
4) INDICATE WHICH OF THE FOLLOWING THIS FORM IS BE EXCESS EMISSIONS	ING USED TO REPORT:		
DOWNTIME OF EMISSIONS MONITORING OR OTHER COMPLIANCE MONITORING EQUIPMENT NOT SPECIFIED IN THE PERMIT			
MISCELLANEOUS INCIDENT OF POSSIBLE NON COMPLIANCE			
5) PERIOD COVERED BY THIS REPORT:			
FROM: October 2, 2003 TO: October 9, 2003			
6) NAME AND PHONE NUMBER OF PERSON TO CONTACT FOR QUESTIONS REGARDING THIS REPORT:			
NAME: <u>Evan Buskohl</u> TITLE <u>Environmental Manager</u> PHONE#: (<u>815)</u> 381-5649 EXT.			

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039 5 DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER

APPLICATION PAGE

FOR APPLICANT'S USE

Printed on Recycled Paper 405-CAAPP

EXCESS EMISSIONS		
7) IDENTIFY THE EMISSION UNIT(S) AND ASSOCIATED CONTROL EQUIPMENT WHICH EXCEEDED AN EMISSION STANDARD, PERMIT CONDITION LIMIT, OR OTHER APPLICABLE REQUIREMENT (IF ADDITIONAL SPACE IS NEEDED FOR THIS SECTION, ATTACH AND LABEL AS EXHIBIT 405-1):		
8) IDENTIFY THE EMISSION STANDARD(S) OR LIMIT(S) THAT WAS EXCEEDED:		
9a) PROVIDE THE TYPE(S) AND AMOUNT(S) OF EMISSIONS THAT OCCURRED DURING THE EXCEEDANCE IN UNITS IDENTICAL TO THAT OF EACH EMISSION STANDARD OR LIMIT THAT WAS EXCEEDED		
b) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EMISSIONS WERE BASED AND LABEL AS EXHIBIT 405-1.		
10) DURATION OF EXCEEDANCE (E.G., 1 HOUR & 50 MINUTES).		
11) DATE OF OCCURRENCE OF EXCEEDANCE: //		
12) DESCRIBE THE EXCEEDANCE INCIDENT, INCLUDING THE SUSPECTED OR KNOWN CAUSE OF THE EXCEEDANCE:		
13) DESCRIBE CORRECTIVE ACTIONS TAKEN AT THE TIME OF THE EXCEEDANCE INCIDENT:		
14) DESCRIBE SUBSEQUENT ACTIONS TAKEN TO PREVENT FUTURE EXCEEDANCES:		
UNPERMITTED DOWNTIME OF MONITORING EQUIPMENT 15) IDENTIFY THE MONITORING EQUIPMENT WHICH WAS NONFUNCTIONAL, INCLUDING THE MONITORED		
PARAMETER AND THE EMISSION UNIT(S) AND/OR CONTROL EQUIPMENT BEING MONITORED:		
16) DATE MONITOR WAS DOWN:///		
17) DURATION OF MONITOR DOWNTIME (E.G., 1 HOUR & 50 MINUTES):		
16) DESCRIBE THE SUSPECTED OR KNOWN CAUSE OF THE MONITOR FAILURE:		
19) DESCRIBE CORRECTIVE ACTIONS TAKEN AT THE TIME OF MONITOR FAILURE:		
20) DESCRIBE SUBSEQUENT ACTIONS TAKEN TO PREVENT FUTURE FAILURES:		

MISCELLANEOUS INCIDENT 21) DESCRIBE THE INCIDENT AND IDENTIFY THE EMISSION UNIT(S) AND CONTROL EQUIPMENT INVOLVED: While the open flare was operating, LFG flow rate was monitored continuously throughout the month of October 2003; however, records for LFG flow data from October 2 through October 8, were lost during the process of upgrading the technician's mobile data storage device (computer laptop). 22) PROVIDE THE RULE(S) OR PERMIT CONDITION(S) WHICH MAY HAVE BEEN VIOLATED (IF APPLICABLE): CAAPP Permit Condition 7.1.9 (b)(ii)(C) 23) DATE OF OCCURRENCE OF THE INCIDENT: October 2 through October 8, 2003 24) DURATION OF THE INCIDENT (E.G., 1 HOUR & 50 MINUTES). 7 Days 25a) PROVIDE THE TYPE AND AMOUNT OF EMISSIONS THAT OCCURRED DURING THE INCIDENT IN UNITS IDENTICAL TO THAT OF EACH EMISSION STANDARD OR LIMIT (IF APPLICABLE): Not applicable b) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EMISSIONS WERE BASED AND LABEL AS EXHIBIT 405-3. 26) DESCRIBE THE SUSPECTED OR KNOWN CAUSE OF THE INCIDENT: The cause of incident was not an equipment related issue, but rather human error during data management. 27) DESCRIBE CORRECTIVE ACTIONS TAKEN AT THE TIME OF THE INCIDENT: Attempts were made to recover the files at the time of loss but proved unsuccessful. 28) DESCRIBE SUBSEQUENT ACTIONS TAKEN TO PREVENT FUTURE INCIDENTS: Staff have been retrained on data management techniques and procedures. Considering the recent upgrade of equipment, this type of event is not expected to happen again. 29) PROVIDE ANY OTHER PERTINENT INFORMATION: The November flare data has been confirmed complete through the date of this report, so similar deviation incidents are not a trend nor expected in the future.

SIGNATURE BLOCK		
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL WILL BE RETURNED AS INCOMPLETE		
30) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION CONTAINED IN COMPLETE.	ITION AND BELIEF FORMED AFTER REASONABLE THIS APPLICATION ARE TRUE, ACCURATE AND	
AUTHORIZED SIGNATURE:		
AUTHORIZED SIGNATURE	Vice President TITLE OF SIGNATORY	
Thomas Hilbert, Env. Mgr. TYPED OR PRINTED NAME OF SIGNATORY	11 / 25 / 2003 DATE	